

Labour and Human Rights Directive by KNISTR

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1. Introduction and purpose

KNISTR GmbH (hereinafter referred to as KNISTR) is aware that every economic and business activity has the potential to have a positive or negative impact on human rights. This effect is exacerbated by increasing globalisation (supply chains for raw materials and labour from low-wage countries).

This Labour and Human Rights Policy (hereinafter referred to as the "Policy") sets out KNISTR's principles, obligations and expectations with regard to the observance and promotion of human rights and the maintenance of fair working conditions. KNISTR is committed to international standards and norms, including:

- The United Nations Universal Declaration of Human Rights
See also: <https://www.un.org/depts/german/menschenrechte/aemr.pdf>
- European Convention on Human Rights
See also: https://www.echr.coe.int/documents/d/echr/convention_DEU
- Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work
See also: <https://www.ilo.org/de/publications/erkl%C3%A4rung-der-iao-%C3%BCber-grundlegende-prinzipien-und-rechte-bei-der-arbeit>

KNISTR recognises that respect for and compliance with human rights and labour standards is not only a legal obligation but also a moral responsibility. This policy serves as the basis for our corporate strategy, our business practices and our relationships with employees, business partners, service providers and suppliers.

2. Scope

This policy applies to:

- All KNISTR employees (regardless of employment contract, employment status or location).
- All suppliers, service providers, subcontractors and business partners who work directly or indirectly with KNISTR.

Anyone who falls within the scope of this policy is obliged to understand, comply with and actively promote the principles contained therein.

3. Fundamental principles

KNISTR is committed to respecting and promoting the following fundamental human and labour rights:

3.1 Respect for human dignity and non-discrimination

- We treat all people with respect, dignity and fairness.
- Any form of discrimination based on gender, age, ethnic origin, skin colour, nationality, religion, sexual orientation, gender identity, disability, social background, political beliefs or marital status is prohibited.
- KNISTR sees great potential for the development of the company resulting from the coming together of people from different backgrounds and with different biographies. KNISTR is therefore committed to enabling, promoting and utilising this diversity.
- Harassment, bullying and intimidation in the workplace will not be tolerated. Such behaviour may be punished with immediate dismissal.

3.2 Freedom of association

- We recognise the right of employees to form and join trade unions and to organise collectively.
- KNISTR will take care to identify and prevent any illegal activities that restrict or impede this right.
- KNISTR ensures that there is open communication between management and the works council.

3.3 Prohibition of forced labour, debt bondage and modern slavery

- Any form of forced labour, debt bondage, human trafficking or involuntary labour is strictly prohibited.
- Employees must not be forced to work through threats, violence or other forms of intimidation.
- All employment contracts must be concluded voluntarily and under transparent conditions.
- All employees may terminate their employment with reasonable notice.

3.4 Child labour and young workers

- KNISTR undertakes not to permit child labour, i.e. dangerous work that is harmful to the health, safety and morals of children.

- The Youth Employment Protection Act and the restrictions set out therein are complied with. Children under the age of 15 and young people who are required to attend school full-time are not employed. In certain cases, school pupils are offered the opportunity to complete internships in compliance with the Youth Employment Protection Act.
- When employing adolescents or young people, KNISTR ensures that the standards of the ILO (International Labour Organisation) and/or the legal regulations on working hours, rest breaks and the prohibition of shift work, night work or overtime are observed.
- Young employees (aged 16-18) are not permitted to perform any tasks that are classified as hazardous, i.e. that could endanger the physical or mental health of young people.
- We expect our suppliers, service providers and business partners to also comply with German and European labour law or, in the case of non-European supply chains, to commit to the following guiding principles:
 - 1) the UN Convention on the Rights of the Child
 - 2) Conventions No. 138 (minimum age for employment) and No. 182 (elimination of child labour) adopted by the International Labour Organisation.

3.5 Fair remuneration and social benefits

- All employees receive at least the statutory minimum wage.
- Wages must be paid on time and in full. Every month, employees receive a comprehensible payslip. This contains the information needed to verify that the work performed has been remunerated as contractually agreed.
- Overtime is remunerated in accordance with legal provisions and applicable company agreements.
- It is not permissible to withhold wages as a disciplinary measure.
- Social benefits (health insurance, holiday pay, pension contributions, etc.) are granted in accordance with national laws and the regulations applicable at KNISTR.

3.6 Working hours and rest periods

- The weekly working time complies with legal requirements.
- Employees are entitled to at least one day off per calendar week (i.e. no 7-day week).
- The statutory regulations apply to breaks and rest periods.
- To support work-life balance, KNISTR has a flexible working time model.

3.7 Health and safety at work

- KNISTR is committed to creating and maintaining safe and healthy working conditions.
- Regular health and safety training is provided.
- Appropriate safety equipment and protective measures are provided.
- A safe and clean workplace must be ensured at all times.

3.8 Protection of privacy and data protection

- The personal data of employees is protected in accordance with applicable data protection laws (e.g. GDPR, BDSG).
- Personal data is only processed with the consent of the person concerned or on a legal basis.
- Any form of monitoring in the workplace is only carried out in accordance with the applicable legal regulations and with respect for the privacy of employees.

4. Expectations of suppliers, service providers and business partners

KNISTR expects all suppliers, service providers and business partners to comply with this policy and implement it in their own value chains. This includes in particular:

- Compliance with human rights and labour rights in accordance with international standards.
- The obligation not to tolerate child labour or forced labour.
- The payment of fair wages and compliance with working time regulations.
- Ensuring safe and healthy working conditions.
- Actively promoting diversity, equality and inclusion.

Before entering into a new business relationship, service providers are therefore screened using a self-disclosure questionnaire, which also includes questions on working conditions and human rights in the "Compliance" section.

5. Monitoring and compliance

- KNISTR conducts regular internal audits and external reviews to ensure compliance with this policy.
- Violations of this policy may result in disciplinary action (up to and including termination) and legal action.
- In the event of violations of this policy by suppliers, service providers and business partners, KNISTR expressly reserves the right to demand corrective measures and evaluate their effectiveness or, as a last resort, to terminate the business relationship.

6. Reporting procedure and protection against retaliation

- Employees and business partners are encouraged to report violations of humane working conditions and human rights immediately to their manager, the Human Resources department or the reporting office in accordance with the Whistleblower Protection Act.
- Whistleblowers are protected from reprisals or discrimination.
- Reports are reviewed and processed by an independent external body.

7. Responsibility and training

- Company management is responsible for implementing and monitoring this policy.
- Managers are obliged to communicate this policy and ensure compliance with it.

8. Continuous improvement and adaptation

- This policy is reviewed regularly and updated as necessary to reflect changing legal requirements and social developments.
- Feedback from employees, service providers, business partners and external stakeholders (e.g. supervisory authorities) will be taken into account and incorporated into the further development of this policy.

9. Entry into force

This Labour and Human Rights Policy shall enter into force with immediate effect and is binding on all employees, business partners, service providers and suppliers.

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